

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GTECH CORPORATION,

Plaintiff,

v.

SCIENTIFIC GAMES INTERNATIONAL, INC.,
SCIENTIFIC GAMES HOLDINGS
CORPORATION, SCIENTIFIC GAMES
FINANCE CORPORATION, and SCIENTIFIC
GAMES CORPORATION,

Defendants.

Civil Action No. 04-138-JJF

**GTECH'S OPPOSITION TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER
TO PRECLUDE PLAINTIFF FROM DISCLOSING SCIENTIFIC GAMES'
CONFIDENTIAL INFORMATION TO J. KENT LOWMAN**

Dated: July 5, 2005

Josy W. Ingersoll (#1088)
Karen E. Keller (#4489)
YOUNG CONAWAY STARGATT & TAYLOR, LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19899-0391
Telephone: 302-571-6600
Facsimile: 302-571-1253

OF COUNSEL:

Thomas J. Meloro
Larissa A. Soccoli
Andrew L. Reibman
KENYON & KENYON
One Broadway
New York, New York 10004
Telephone: (212) 425-7200
Facsimile: (212) 425-5288

GTECH respectfully submits this opposition to Defendants' Motion for Protective Order to Preclude Plaintiff from Disclosing Scientific Games' Confidential Information to J. Kent Lowman (D.I. 90).

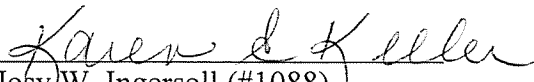
Defendants' objection to Mr. Lowman is without merit. Mr. Lowman is not currently doing any design or research and development concerning ITVM's. GTECH from time to time requests technical support information from Mr. Lowman regarding the existing machines with which Mr. Lowman is familiar, but Mr. Lowman is not presently involved with any design of ITVM's, and he has no plans to do so. (D.I. 90 at Ex. B). Further, Mr. Lowman has signed the requisite undertaking pursuant to the Protective Order in this case (D.I. 26), and he understands his obligations under the same.

Nevertheless, to avoid unnecessary controversy, GTECH has offered to withdraw its request to disclose Scientific Games' confidential information to Mr. Lowman upon approval by Scientific Games of GTECH's expert Sheila Smith. Scientific Games, as it did with GTECH's experts Joseph C. Perin and Mr. Lowman, has objected to the disclosure of confidential information to Ms. Smith. Under the Protective Order in this case (D.I. 26) and the stipulation filed June 30, 2005 (D.I. 93), Scientific Games is required to file a brief objecting to Ms. Smith by today, July 5, 2005. Scientific Games has refused GTECH's proposal and has refused to allow either Mr. Lowman or Ms. Smith to have access to Scientific Games' confidential information.

Scientific Games' continued objections to GTECH's experts is inappropriate and without basis and is interfering with GTECH's case preparations. Scientific Games' motion should be denied.

YOUNG, CONAWAY, STARGATT
& TAYLOR, LLP

Dated: July 5, 2005

By: 
Josy/W. Ingersoll (#1088)
Karen E. Keller (#4489)
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19889
(302) 571-6600
kkeller@ycst.com
Attorneys for Plaintiff
GTECH Corporation

OF COUNSEL
Thomas J. Meloro
Larissa A. Soccoli
Andrew L. Reibman
KENYON & KENYON
One Broadway
New York, New York 10004
Telephone: (212) 425-7200
Facsimile: (212) 425-5288

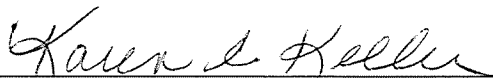
CERTIFICATE OF SERVICE

I, Karen E. Keller, Esquire, hereby certify that on July 5, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Jack B. Blumenfeld, Esquire
Morris Nichols Arsht & Tunnell
1201 North Market Street
PO Box 1347
Wilmington, DE 19899-1347

I further certify that on July 5, 2005, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Karen E. Keller (#4489)
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
kkeller@ycst.com

Attorneys for Plaintiff